

1 WALDO LAW, LLC
2 JENNIFER M. WALDO, ESQ.
3 Nevada Bar No. 11900
4 10161 West Park Run Drive,
5 Suite 150
6 Las Vegas, Nevada 89145
Telephone: (702) 908-2431
Facsimile: (702) 901-6192
Email: jmw@jwaldolaw.com
Attorney for Emerald Wilson-Bey

7 UNITED STATES DISTRICT COURT
8
DISTRICT OF NEVADA

9
10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 EMERALD RUTH WILSON-BEY,

14 Defendant.

CASE NO: 2:21-cr-00306-GMN-NJK

**STIPULATION AND ORDER TO
CONTINUE CHANGE OF PLEA
HEARING**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson
19 United States Attorney, through Jim. W. Fang, Assistant United States Attorney, counsel for the
20 United States of America, and Jennifer M. Waldo counsel for Emerald Ruth Wilson-Bey that the
21 Change of Plea hearing, currently scheduled for Tuesday, January 17, 2023 be vacated and
22 advanced to Tuesday, January 3, 2023 at 2:00 p.m.

24 ////

25 ////

26 ////

STIPULATION AND ORDER TO CONTINUE CHANGE OF PLEA HEARING - 1

1 The Stipulation is entered into for the following reasons:

- 2 1. That the parties resolved this matter through pretrial plea negotiations and have
3 submitted a fully-executed plea agreement to the Court for its consideration;
- 4 2. On November 2, 2022, an expedited change of plea hearing was set for December
5 6, 2022 at 11:00 a.m.;
- 6 3. That based upon the stipulation of parties (ECF No.: 117), the change of plea
7 hearing was moved up to November 29, 2022;
- 8 4. That on November 28, 2022, the parties filed another stipulation (ECF No.: 118)
9 to continue the change of plea hearing to allow defense counsel additional time to
10 speak with Ms. Wilson-Bey regarding the negotiations;
- 11 5. That Ms. Wilson-Bey and her counsel have since spoken regarding the plea
12 negotiations and she is ready to move forward with the current deal;
- 13 6. That counsel for Ms. Wilson-Bey has spoken to government counsel and the
14 government has no objection to advancing the change of plea hearing; and
- 15 7. This is the second request to advance the change of plea hearing.

16 DATED this 20th day of December, 2022.

17 JASON M. FRIERSON
18 United States Attorney

19 _____
20 /s/ Jim W. Fang

21 Counsel for USA

22 WALDO LAW, LLC.

23 _____
24 /s/ Jennifer M. Waldo

25 Counsel for Emerald Wilson-Bey

WALDO LAW, LLC
JENNIFER M. WALDO, ESQ.
Nevada Bar No. 11900
10161 West Park Run Drive,
Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 908-2431
Facsimile: (702) 901-6192
Email: jmw@jwaldolaw.com
Attorney for Emerald Wilson-Bey

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

CASE NO: 2:21-cr-00306-GMN-NJK

Plaintiff,

vs.

EMERALD RUTH WILSON-BEY,

**STIPULATION AND ORDER TO
CONTINUE CHANGE OF PLEA
HEARING**

Defendant.

FINDINGS OF FACT

1. That the parties resolved this matter through pretrial plea negotiations and have submitted a fully-executed plea agreement to the Court for its consideration;
 2. On November 2, 2022, an expedited change of plea hearing was set for December 6, 2022 at 11:00 a.m.;
 3. That based upon the stipulation of parties (ECF No.: 117), the change of plea hearing was moved up to November 29, 2022;
 4. That on November 28, 2022, the parties filed another stipulation (ECF No.: 118) to continue the change of plea hearing to allow defense counsel additional time to speak with Ms. Wilson-Bey regarding the negotiations;

5. That Ms. Wilson-Bey and her counsel have since spoken regarding the plea negotiations and she is ready to move forward with the current deal;
 6. That counsel for Ms. Wilson-Bey has spoken to government counsel and the government has no objection to advancing the change of plea hearing; and
 7. This is the second request to advance the change of plea hearing.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interests of the public and the defense in a proceeding with the change of plea hearing as currently scheduled.

ORDER

IT IS THEREFORE ORDERED that the change of plea hearing currently scheduled for January 17, 2023 at 11:00 a.m., be vacated and advanced to the 3rd day of January, 2023, at the hour of 2:00 pm.

DATED AND DONE this 20 day of December, 2022.


Diane L. Hustedt